

Privacy Notice of 2Connect Távközlési Infrastruktúra és Hálózati Szolgáltatások Kft. regarding cookies and similar digital technologies used on its website

This Privacy Notice explains how **2Connect Távközlési Infrastruktúra és Hálózati Szolgáltatások Kft.** (address: 1013 Budapest Krisztina krt. 39., e-mail: wholesale@2connect.hu, hereinafter: **"the Company"** or **"we"**) processes the personal data of persons visiting website <https://2connect.com/> (hereinafter: **"website"**) in accordance with the requirements of the General Data Protection Regulation (hereinafter: **"GDPR"**) and Act CVIII of 2001 on certain issues of electronic commerce services and services related to the information society (hereinafter: **"Elkertv."**) when it uses so-called "digital technologies" to provide our services, develop them, or enhance the user experience.

If you have any further questions regarding this Privacy Notice, please contact our data protection officer at the following contact details:

Postal address: 1013 Budapest, Krisztina krt. 39.

E-mail address: dpo@2connect.hu

1. What digital technologies do we use for our service?

We use the following digital technologies on our website:

Cookie(s):

Cookies are small text files placed on the user's device by the browser that perform identification and collect information. A cookie consists of a unique string of numbers and is primarily used to identify computers and other devices that download a website. Cookies have several functions, including collecting information, such as remembering user settings, and allowing the website owner to learn about user habits in order to improve the user experience.

Pixel or web beacon:

A tracking pixel or web beacon is a piece of code that can be loaded when a user visits a website or opens an email. These are usually very small, often invisible technologies that can appear on your screen as a user. Through pixels, we can collect information about how you use our website, among other things.

Local browser storage (local storage and session storage):

Local browser storage refers to separate local storage locations in the user's browser where the information to be stored is only available in the selected browser and not in others, and the information stored here is not shared with other computers.

When using "session storage" technology, as soon as you close the tab in your browser where the information was stored, the information stored there is automatically deleted.

In contrast, with "local storage," regardless of which tabs you close or open, the data associated with the website will remain there **until you delete it**.

Software development kit or SDK:

Software development kits combine various tools in an easy-to-install package that we use to help create mobile phone application features for certain mobile phone operating systems (such as Google Android or Apple iOS). Such functions may include displaying advertisements or offering push notifications.

2. How can digital technologies be controlled and their use turned off?

In case of websites:

In addition to the cookies management options of the website, all modern browsers allow you to change the setting of cookies. Most browsers automatically accept cookies by default, they can usually be changed to prevent automatic acceptance and offer a choice whether you want to authorise cookies or not each time you visit a website.

Since certain cookies are intended to facilitate or enable the usability and processes of the website, preventing or turning off the use of these cookies may have the consequence that you will not be able to fully use the website's functions or that the website will function differently in your browser than intended.

At the links below, you can learn about the cookie settings of the most popular browsers as well as find information on how to change cookie settings through your web browser:

- **Google Chrome:** <https://support.google.com/accounts/answer/61416>
- **Firefox:** <https://support.mozilla.org/hu/kb/sutik-informacio-amelyet-weboldalak-tarolnak-szami>
- **Opera:** <https://help.opera.com/en/latest/web-preferences/#cookies>
- **Safari:** <https://support.apple.com/hu-hu/guide/safari/sfri11471/mac>
- **Microsoft Edge:** <https://support.microsoft.com/hu-hu/help/4468242/microsoft-edge-browsing-data-and-privacy>

In the case of other temporary files, such as local browser storages, it is also possible to delete the information stored in them, however, in many cases the purpose of these technologies is to facilitate or enable the usability and processes of the website, so preventing or turning off the use of these technologies may have the consequence that you will not be able to fully use the website's functions or that the website will function differently in your browser than intended.

At the links below, you can learn about the cookie settings of the most popular browsers as well as find information on how to change cookie settings through your web browser:

- **Google Chrome:** [Clear cache and delete cookies - Computer - Google Account Help](#)
- **Firefox:** [Clear cache - Delete temporary files to solve general website issues | Firefox Help](#)
- **Opera:** <https://blogs.opera.com/tips-and-tricks/2023/04/clean-browser-and-remove-trackers/>
- **Safari:** [Clear the history, cache, and cookies from Safari on your iPhone, iPad, or iPod touch - Apple Support](#)
- **Microsoft Edge:** [How to Manage and Clear Your Cache and Cookies | Edge Learning Center](#)

In case of mobile phone users:

As a mobile phone user, you have the option to disable tracking for applications in your mobile phone settings.

For the most popular mobile operating systems, you can do this using the following functions:

- **iOS (Apple mobile phones):** [If an app asks to track your activity - Apple Support](#)

- **Google Android:** [Turn "Do Not Track" on or off - Android - Google Chrome Help](#)

3. What digital technologies do we use for the website?

Below we present the digital technologies we use and list the types of data processed through digital technologies, their retention period, and the legal basis and purpose of data processing. For each digital technology, we also mention if we use a technology provided by a third party. In the latter case, you can find information on the third party's use of data stored using digital technologies in their own privacy notices on the third party's website.

A) Digital technologies essential for operation

We use these digital technologies because they are essential for the operation of the website. These technologies remember the settings you have made on the website. These digital technologies cannot be turned off.

We use these technologies based on our legitimate interest pursuant to Article 6(1)(f) of the GDPR and Section 13/A para. (3) of the Elktv.

Name of digital technology	Type of digital technology	Purpose of digital technology	Scope of the processed data	Retention period of data stored with the technology	Is this technology provided by a third party?
XSRF-TOKEN	Cookie	This cookie is set to ensure the security of the website by preventing forged requests between websites.	Identification of the current page load	2 hours	No
cookiesession1	Cookie	This cookie is set by Fortinet Firewall. This cookie is used to protect the website from abuse.	Settings related to the current workflow	365 days	No
cookiehub	Cookie	CookieHub uses it to store information about whether visitors have allowed or rejected the use of cookie categories used on the website.	Unique user ID; User consent, refusal	365 days	Yes (Cookiehub)
2connect_hu_sit_e_session	Cookie	Ensuring basic functionality, identifying workflows	Unique user ID - HASH	2 hours	No

N3-MULTIVERSE-TENANT	Cookie	Ensuring basic functionality, identifying the website	Unique user ID - UUID	2 hours	No
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B) Digital technologies used for statistical (analytical) purposes

These digital technologies are used to monitor the performance of the website and to track the actions taken by users on the website in order to improve the website.

These digital technologies can be used to collect statistical data on visits to the website and to analyse how much time users spend on the website.

We process these digital technologies on the basis of your consent pursuant to Article 6(1)(a) GDPR and Article 13/A(4) of Act CVIII of 2001 on electronic commerce.

You have the right to withdraw your consent at any time, however, the withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal.

Name of digital technology	Type of digital technology	Purpose of digital technology	Scope of the processed data	Retention period of data stored with the technology	Is this technology provided by a third party?
_ga	Cookie	Visitors to the website are assigned a unique ID, which we use to collect statistical data about how visitors use the website.	Unique user ID; Pages visited; Click path; Date and time of visit	400 days	Yes (Google Analytics)
ga*	Cookie	Contains a unique ID that Google Analytics uses to determine that two different hits belong to the same user during browsing sessions.	Unique user ID; Date and time of visit; Content of the current workflow	400 days	Yes (Google Analytics)

4. What data processors do we use?

To achieve the above purposes, the table below describes the service providers we use as data processors. These service providers carry out certain data processing activities on our behalf and for our benefit.

Data processor	Registered office of the data processor	Activity carried out by the data processor on our behalf
Elementary Interactive Kft.	1048 Budapest, Sárpatak utca 2.	Processing and forwarding of data entered in website forms to the storage facility

5. Your rights

- A) Withdrawal of consent:** You have the right to withdraw your consent to the processing of your personal data at any time without giving reasons. The withdrawal of consent shall not affect the lawfulness of processing that was carried out based on consent before its withdrawal. If you withdraw your consent, we will no longer process your personal data and will erase or anonymise the same.
- B) Right of access:** You have the right to know whether your personal data is being processed; if they are being processed, you have the right to request us to provide access to your personal data. You also have the right to request a copy of your personal data from us. If you request additional copies, we may charge you a reasonable fee. We may ask you for additional information to confirm your identity.
- C) Right to rectification:** You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have any incomplete personal data completed.
- D) Right to erasure:** You have the right to request the erasure of personal data concerning you.
- E) Right to restrict processing:** You have the right to restrict the processing of your personal data in certain cases. Where processing of your personal data has been restricted, we can process your data only with your consent or for establishing, exercising or defending legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.
- F) Right to data portability:** You have the right to receive the personal data concerning you, which you have provided to the Company, in a structured, commonly used and machine-readable format and to transmit such data to another controller.
- G) Right to object:** You have the right to object to the processing of your personal data if the processing is based on our legitimate interests. In this case, we will block your personal data for a period of time that allows us to determine whether there are compelling legitimate grounds for continuing the data processing. In the absence of such grounds, we will stop processing your data and erase/anonymise the same.

6. Filing a complaint to the Data Protection Authority

If we have processed your personal data inappropriately, or contrary to the applicable laws, or if we have not complied with your request to exercise your rights, or have not complied with it properly, you have the right to file a complaint with the National Authority for Data Protection and Freedom of Information at the following contact details: registered office: 1055 Budapest, Falk Miksa Street 9-11.; E-mail address: ugyfelszolgalat@naih.hu; Phone number: +36 (30) 683-5969; +36 (30) 549-6838; +36 (1) 391 1400, Fax: +36 (1) 391-1410; Web: <https://www.naih.hu/>.